Pending Questions from the Q&A of March 8, 2022, State of 911 Webinar

FCC Session

1. Under what rules do ‘private’ 5G wireless networks fall? MLTS or CMRS?

   **ANSWER:** The definitions of CMRS and MLTS in our rules are technology-neutral, so classification of 5G networks will generally be on the same basis as classification of earlier-generation networks (e.g., 3G or 4G). To determine whether a specific network would be classified as CMRS or MLTS, we would need more detail on the particular situation. See generally [https://www.fcc.gov/mlts-911-requirements](https://www.fcc.gov/mlts-911-requirements) and [https://www.fcc.gov/public-safety-and-homeland-security/policy-and-licensing-division/911-services/general/location-accuracy-indoor-benchmarks](https://www.fcc.gov/public-safety-and-homeland-security/policy-and-licensing-division/911-services/general/location-accuracy-indoor-benchmarks).

2. Could you again define “dispatchable location”?

   **ANSWER:** Dispatchable location information includes the street address of the caller and additional information, such as a room or floor number, necessary to adequately locate the caller. See, e.g., [https://www.fcc.gov/911-dispatchable-location](https://www.fcc.gov/911-dispatchable-location).

3. Have there been any updates to text-to-911?

   **ANSWER:** As of March 2022, there are almost 3,000 PSAPs that have registered with the FCC’s Text-to-911 Registry as having text-to-911 capabilities. See the FCC’s “PSAP Text-to-911 Readiness and Certification Registry (Text-to-911 Registry)” webpage for more details, including information on text-to-911 requirements and compliance dates, and a link to a regularly updated list of the registered text-to-911 capable PSAPs: [https://www.fcc.gov/general/psap-text-911-readiness-and-certification-form](https://www.fcc.gov/general/psap-text-911-readiness-and-certification-form). See also [https://www.fcc.gov/911-dispatchable-location](https://www.fcc.gov/911-dispatchable-location) (includes compliance information for dispatchable location requirements for mobile text service).

4. With multiple locations using a centralized telecom system, who is responsible for validating location for remote office users; the telecom vendor, the customer, or the SIP carrier?

   **ANSWER:** Without more detail, we cannot provide a definitive answer to this question. The roles and responsibilities of MLTS participants will vary depending on the type of system and the situation at issue. See generally, e.g., Implementing Kari’s Law and Section 506 of RAY BAUM’S Act; 911 Access, Routing, and Location in Enterprise Communications Systems; Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission’s Rules, PS Docket Nos. 18-261 and 17-239, GN Docket No. 11-117, Report and Order, 34 FCC Rcd 6607, 6655-6669, paras. 138-169 (2019), corrected by Erratum, 34 FCC Rcd 11073 (PSHSB Dec. 2, 2019); see also, e.g., 47 CFR § 9.16(b)(3) (MLTS dispatchable location requirements); FCC, Multi-line Telephone Systems – Kari’s Law and RAY BAUM’S Act 911 Direct Dialing, Notification, and Dispatchable Location Requirements (Apr. 22, 2020), [https://www.fcc.gov/mlts-911-requirements](https://www.fcc.gov/mlts-911-requirements).
5. **What if the major carriers are not providing x,y at the 80% yet.**

**ANSWER:** The major carriers certified compliance with the 80% x/y horizontal location metric in 2021, and we are not aware of any major carrier that is not meeting the metric. Any complaints or concerns regarding possible non-compliance can be filed with the FCC Public Safety Support Center at [https://www.fcc.gov/general/public-safety-support-center](https://www.fcc.gov/general/public-safety-support-center).

6. **The MLTS location regulation compliance date was January 2022? Does this apply to only new systems or existing systems?**

**ANSWER:** The Commission’s dispatchable location rules for MLTS are forward-looking and apply to all MLTS that were manufactured, imported, offered for first sale or lease, first sold or leased, or installed after February 16, 2020. Such MLTS are subject to compliance deadlines of January 6, 2021, and January 6, 2022, depending on the nature of the device from which the MLTS 911 call originates. Conversely, MLTS that were manufactured, imported, offered for first sale or lease, first sold or leased, or installed on or before February 16, 2020, are generally not subject to the dispatchable location rules.

However, an important caveat is that if the MLTS was installed before February 17, 2020, but is upgraded on or after February 17, 2020, it could be subject to the dispatchable location requirements depending on the magnitude of the upgrade. While not all upgrades trigger coverage, we generally consider upgrades to core MLTS software or hardware functions to be of sufficient magnitude to bring an MLTS within the scope of the statute and rules. For details on all these points, please see [https://www.fcc.gov/mlts-911-requirements](https://www.fcc.gov/mlts-911-requirements) and [https://www.fcc.gov/file/18441/download](https://www.fcc.gov/file/18441/download). Note also that these are the federal MLTS requirements and that MLTS systems that are not covered by federal requirements may still be subject to individual states’ MLTS requirements.

7. **Any updates on new 911 grant funding? Last I heard we were still waiting for the federal budget.**

**ANSWER:** We have no updates at this time.

8. **Real time text is as they come in we answer or there is a delay in some?**

**ANSWER:** The question is somewhat unclear, but we can provide the following guidance. The FCC’s rules require that once a PSAP is capable of receiving real-time text (RTT) communications, CMRS providers must deliver 911 communications in RTT format within six months of a “valid request” from the PSAP, provided the CMRS provider has selected RTT as its accessible text communication method. Registration in the FCC’s Text-to-911 Registry serves as the required notice of a “valid request” to covered text providers and triggers the requirement that they must begin delivering text-to-911 within six months. However, PSAPs are not required to use the Text-to-911 Registry and may instead request text-to-911 or RTT-to-911 service by providing written notification via any means reasonably acceptable to the service provider. See, e.g., [DA-21-301A1.pdf](https://www.fcc.gov/).
9. **Any updates on using spectrum auctions to fund NG911?**

   **ANSWER:** The FCC’s statutory authority to auction spectrum is scheduled to expire on September 30, 2022. Any extension of the FCC’s auction authority beyond that date will require congressional action. In February 2022, FCC Chairwoman Jessica Rosenworcel proposed that, if and when Congress reauthorizes the FCC’s spectrum auction authority, it consider taking the funds from future spectrum auctions and using them to help pay for the nation’s transition to Next Generation 911. It will be up to Congress to decide whether to include funding for NG911 in any FCC auctions legislation.

10. **You might have already addressed this issue. Currently, anyone that calls 911, it goes to local agency. If 911 transfer calls to 988, how do you ensure that those calls get routed to local crisis center?**

   **ANSWER:** State and local agencies determine the protocols to transfer calls from 911 to 988. Multiple federal and local authorities and other entities are working on implementing the use of 988 as the national suicide prevention and mental health crisis phone number, including related interoperability and appropriate routing issues. See, e.g., 911.gov, *State of 911: National 911 Program* (Sept. 14, 2021) (including discussion of 988 issues) at https://www.911.gov/pdf/Sept_2021_State_of_911_Webinar_Presentation.pdf (PowerPoint presentation) and https://www.youtube.com/watch?v=K3iXs7hYmUc (same PowerPoint presentation with narrator); NENA: The 9-1-1 Association, *NENA Suicide/Crisis Line Interoperability Standard* (Mar. 4, 2022), https://www.nena.org/page/SuicideCrisisLineInterop.

**Cyber Assessment Presentation**

11. **Any plans to consolidate PSAPs and, doing so, reduce the number of PSAP?**

   **MA ANSWER:** The Massachusetts State 911 Department has been conducting a 911 regionalization effort since 2009 through an incentive grant program. In 2009, we had 264 PSAPs; today, through this effort, we have 215. The effort continues. We are hoping over the next five years to reduce the number of PSAPs to 200.

   **NC ANSWER:** Though we are encouraging PSAPs to consider the advantages of such collaborative partnerships, the NC 911 Board does not have authority to make such decisions. The Board most recently implemented a grant program for consolidation of PSAPs.

12. **Was vulnerability testing done at each PSAP in MA?**

   **MA ANSWER:** No. Testing was done at a live PSAP setting we have developed at a lab in our offices in Middleborough, Massachusetts.
13. Do you feel the 5-year audit frequency is adequate?

**MA ANSWER:** Overall, I think so, but the frequency will depend on the circumstances at the time. I do not think the period should be greater than five years, but it could be less.

**NC ANSWER:** We are evaluating the most efficient and beneficial assessment period for PSAPs. At this time, we are discussing a three-year frequency that will coincide with the required (legislatively mandated) PSAP review that is to be conducted.

14. How did you do this security vulnerability testing/penetration testing without affecting the live 911 system/service?

**MA ANSWER:** Testing was done at a live PSAP setting we have developed at a lab in our offices in Middleborough, Massachusetts. Testing also was monitored by our Next Generation 911 service provider.

**NC ANSWER:** Testing was conducted at each of the 127 PSAPs in a live setting. We were not notified of any impacts on systems or 911 service delivery.

15. What lessons were learned/what would you recommend to other states?

**MA ANSWER:** Vulnerabilities can be found anywhere on the system, and most can be remediated fairly quickly. I would recommend testing be done with the frequency depending on various factors, including funding to pay for the testing.

**NC ANSWER:** Echo MA. The size or geographic location of a PSAP has no bearing on the potential of threats and attacks. All PSAPs and local jurisdictions need to make cyber health a priority.

16. Are the cybersecurity assessments being performed per a standard? If so, what is the consequence of non-compliance to the standard?

**MA ANSWER:** The system was tested per (1) current FBI Criminal Justice Information Security Policies, (2) NENA Security for NG911 Standard, (3) Next Generation 911 Security Audit Checklist NENA 75-502, and (4) industry and government security practices and standards. Testing was primarily performed on an “inside-out” evaluation by examining core systems to identify vulnerabilities that could be leveraged to impact Next Generation 911 operations. Vulnerability findings were assigned a risk rating (high/medium/low) based on Common Vulnerability Scoring System (CVSS) 3.0 rating.

**NC ANSWER:** Performed to recognized standards that included NIST 800-53, CJIS, and FIPS. Risk ratings were determined on both external and internal evaluations, with a ranking of low, medium, and high being assigned. Each PSAP was provided a report that outlined its findings. The only consequences addressed by the Board are those that may have indicated compromise to the ESInet. See response to Question #17 for ongoing assistance.
17. When cyber security issues are uncovered, is remediation of the issues tracked?

**MA ANSWER:** Yes.

**NC ANSWER:** This is the goal of future collaboration with the PSAPs to assist them with a Corrective Action Plan (CAP) and ongoing remediation.

18. What was the rough total cost for each of these three projects?

**MA ANSWER:** Our first audit in 2016 cost $55,500. The cost of the second audit in 2022 is estimated to be roughly $125,000.

**NC ANSWER:** $1,481,300